

July 21, 2019

By ECF

Hon. Allyne R. Ross  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

RE: US v. Rahmel Smith  
Indictment No. 19-cr-137 (ARR)

Your Honor:

On behalf of my client, Rahmel Smith, I respectfully submit this letter motion setting forth our requests of the Government, pursuant to Rule 12 of the Federal Rules of Criminal Procedure:

- 1) The production of all relevant documents, reports, records and materials under Rule 16;
- 2) The immediate disclosure of all *BRADY* material;
- 3) The immediate disclosure of all *GIGLIO* material and *JENKS ACT material*;
- 4) Notice of any statements made by Rahmel Smith to law-enforcement authorities that the Government intends to introduce at trial during its direct case;
- 5) Notice of any Rule 404(b) material the Government intends to introduce at trial;
- 6) Any further relief the Court deems just, fair and proper.

Dated: New York, New York  
July 21, 2019

Respectfully submitted,

Jeremy F. Orden, Esq.  
Attorney for Rahmel Smith